

**EXHIBIT “A”**

Page 1 of 3		New Jersey Police Crash Investigation Report		Reportable		Non-Reportable		Change Report		
01	1 Case Number	D020-2020-00576A		10	Crash Occurred On:	NJTP SNI		11	Speed Limit	
01	2 Police Dept of	STATE POLICE		12	Route No.	52		13	Milepost	
01	3 Station/Precinct	MOORESTOWN		14	15	16		17	Cross Road Name	
03	4 Date of Crash	5	Day of Week	6	Time	7	Municipality	8	Total Killed	
01	09	26	20	Su M Tu W Th F Sa	1434	0319				
04	23 Veh No	24	Policy No.	25	Ins Code	53	Veh No	54	Policy No.	
01	V1	01528110-0		99		V2	5345J262773		99	
02	28 Driver's First Name	Initial	Last Name	29	Sex	56	Driver's First Name	Initial	Last Name	
01	BYRON	F	GODFREY	M		HU	PIAO	M		
01	27 Number & Street	1508 WESTOVER DR			57	Number & Street	12212 LINCOLN LAKE WAY, APT. 2109			
01	28 City	State	Zip	58	City	State	Zip			
02	SANDFORD	NC	27330	FAIRFAX	VA	22030				
02	30 Eyes	DL Class	Restrictions	Endorsements	31	State	60	Eyes	DL Class	
02	02	D	-	-	NC		02	D	-	
02	32 Driver's License Number	33	DOB	34	Expires	62	Driver's License Number	63	DOB	
02	000025632995	07	09	81	07	21	T29722344	01	10	
02	35 Owner's First Name	Initial	Last Name	65	Owner's First Name	Initial	Last Name			
02	Same As Driver	C	AND M MARKETING	Same As Driver						
02	36 Number & Street	3206 RUTLEDGE PL			66	Number & Street				
02	37 City	State	Zip	67	City	State	Zip			
02	QUINCY	IL	62301							
04	38 Make	39	Model	40	Color	41	Year	42	Plate No.	
04	PTRB	TR		RED	2017	P1009097	IL	68	Make	
02	44 VIN	45	Expires	74	VIN	75	Expires	76	Vehicle Removed To	
02	1XPBDF9X1HD434064	03	21	JN8AZ2NE5K9231697	02	21				
01	46 Vehicle Removed To				76	Vehicle Removed To				
01	47 Authority				77	Authority				
01	48 Alcohol Drug Test				78	Alcohol Drug Test				
05	Given: No Yes Refused				Given: No Yes Refused					
01	Type: Breath Blood Urine				Type: Breath Blood Urine					
01	Results: 0 % Pending				Results: 0 % Pending					
01	50 Carrier No.	51	GVWR / GCWR (trucks & buses only)	80	Carrier No.	81	GVWR / GCWR (trucks & buses only)			
01	USDOT 3047510	None		USDOT	None					
01	MC/MX			MC/MX						
01	52 Motor Carrier or Government Entity				82	Motor Carrier or Government Entity				
01	Number & Street				82	Number & Street				
01	City	State	Zip	82	City	State	Zip			
01	135 Damage To Other Property				82	City	State	Zip		
01	Oper.	136	Charge	137	Summons No.	Oper.	136	Charge	139	
01	Oper.	140	Charge	141	Summons No.	Oper.	142	Charge	143	
01	Oper.	140	Charge	141	Summons No.	Oper.	142	Charge	143	

	83	84	85	86	87	88	89	90	91	92	93	94	95	Names & Addresses of Occupants - If Deceased, Date & Time of Death
A	V1	01	01	05	39	M	-	-	-	11	04	-	-	BYRON P GODFREY 1508 WESTOVER DR, SANDFORD, NC 27330
B	V2	01	01	05	38	M	-	-	-	11	04	-	-	HU PIAO 12212 LINCOLN LAKE WAY, APT. 2109, FAIRFAX, VA 22030
C														
D														

New Jersey Police Crash Investigation Report	Case Number D020-2020-00576A	Page <u>2</u> of <u>3</u>
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## 145. Crash Description/Narrative

Driver 1 stated to the effect: I was driving in the center lane and was almost cut off and hit the car in the left lane.

Driver 2 stated to the effect: I was driving in the left land and got hit by the truck.

Investigation at the scene revealed: V1 was traveling in the center lane northbound (SNI) on the New Jersey Turnpike in the area of milepost 52, Mansfield Township, Burlington County. V1 failed to maintain directional control of V1 and side-swiped V2 which was traveling in the right lane. V1 sustained minor damage to its front driver's side quarter panel. V2 sustained minor damage to its rear passenger side quarter panel. There were no injuries noted or observed on scene. Both vehicles were driven from the scene.

## V1 trailer information:

License # - 654854ST / IL

VIN: 1JJV532D2AL379079

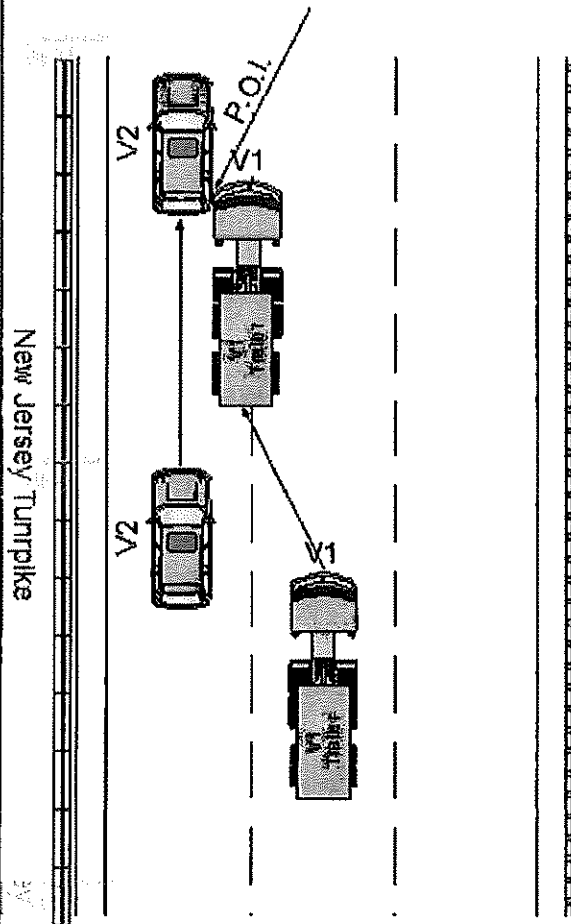
Page #1, Box #25: THE PALADIN GROUP INSURANCE COMPANY

Page #1, Box #55: NATIONWIDE VA

Page #1, Box #118a: V1 FAILED TO MAINTAIN DIRECTIONAL CONTROL

<p align="center"><b>New Jersey Police</b> <b>Crash Investigation Report</b></p>	<p>Case Number <b>D020-2020-00576A</b></p>	<p>Page <u>3</u> of <u>3</u></p>
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144. Crash Diagram



*Not To Scale*

New Jersey Turnpike  
SNI Roadway Milepost 52  
Mansfield Township  
Burlington County

146. Officer's Signature

TPR. A R RIVERA *[Signature]*

147. Badge #  
**8076**

148. Reviewer  
**TL**

Badge #  
**7044**

149. Case Status  
☐ Pending ☒ Complete

**EXHIBIT “B”**

**LAW OFFICES OF CONRAD PARK, P.C.**

Changhyun Conrad Park, Esq.  
 Attorney I.D.: 012082008  
 2160 N. Central Road Suite 106  
 Fort Lee, NJ 07024  
 (201) 266-0666  
 Attorneys for Plaintiff HU PIAO

HU PIAO,

Plaintiff,

vs.

BYRON P GODFREY AND  
 C & M MARKETING AND FOOD SALES  
 LLC,

Defendant.

: SUPERIOR COURT OF NEW JERSEY  
 : LAW DIVISION: BERGEN COUNTY

: DOCKET NO.:

: CIVIL ACTION

: **COMPLAINT WITH DEMAND FOR**  
 : **TRIAL BY JURY**

Plaintiff, HU PIAO, by way of Complaint, state:

1. Plaintiff HU PIAO, is an adult individual residing at 12212 Lincoln Lake Way, Fairfax, VA 22030.

2. Defendant BYRON P GODFREY, is an adult individual residing at 1508 Westover Drive, Sanford, NC 27330.

3. Defendant C & M MARKETING AND FOOD SALES LLC ("C & M MARKETING") is a business duly authorized to conduct business with an office at 3206 Rutledge Place, Quincy, IL 62301.

4. Defendant BYRON P GODFREY, was and has been an employee, agent, and/or servant of defendant C & M MARKETING .

5. On or about September 26, 2020, plaintiff HU PIAO was operating his vehicle, which was traveling on New Jersey Turnpike in Maple Shade Township, Burlington, New Jersey.

6. At the same time and place aforesaid, defendant BYRON P GODFREY was operating a motor vehicle owned by defendant C & M MARKETING, in the course of employment with defendant C & M MARKETING as an employee, agent, and/or servant of defendant C & M MARKETING, in the same direction as plaintiff's vehicle was traveling on New Jersey Turnpike.

7. At the same time and place aforesaid, an incident occurred when defendants' vehicle came into contact with plaintiff's vehicle, causing plaintiff HU PIAO to be violently thrown inside the vehicle.

8. Defendant, BYRON P GODFREY operated the motor vehicle owned by defendant C & M MARKETING in such a reckless, careless, and negligent manner so as to cause the accident.

9. Defendant C & M MARKETING so recklessly, carelessly, and negligently hired defendant BYRON P GODFREY and entrusted its motor vehicle to defendant BYRON P GODFREY.

10. As a direct and approximate result of said accident plaintiffs, HU PIAO sustained personal injuries, which resulted in permanent injuries, which have not healed to function normally and will not heal to function normally with further medical treatment.

11. As a further result of the Defendants' negligence, plaintiff HU PIAO has incurred and will continue to incur expenses for doctors, hospitals and other medical treatment for his injuries. In addition, plaintiff has been disabled and unable to perform his usual functions and have been caused and will be caused great pain and suffering, to his great loss and damage, and has sustained property damage and past and future lost wages.

WHEREFORE, plaintiff, HU PIAO demands judgment against the defendants BYRON P GODFREY and C & M MARKETING and/or in the alternative, for damages, together with

interest, cost of suit and attorneys' fees.

*Park Changhyun*

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Changhyun Conrad Park, Esq.  
Attorney for Plaintiff

Dated: September 2, 2021



#### CERTIFICATION

I hereby certify that, pursuant to R.4:5-1, the matter in controversy is not the subject to any other action pending in any Court or of any arbitration proceeding and no such action or proceeding is contemplated. I know of no other party who should be joined in this action.

*Park Changhyun*

Changhyun Conrad Park, Esq.  
Attorney for Plaintiff

Dated: September 2, 2021

#### DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that pursuant to R.4:25.4, Changhyun Conrad Park, Esquire is hereby designated trial counsel in this matter.

*Park Changhyun*

Changhyun Conrad Park, Esq.  
Attorney for Plaintiff

Dated: September 2, 2021

#### JURY DEMAND

Plaintiff, HU PIAO, demand a trial by jury on all issues.

*Park Changhyun*

Changhyun Conrad Park, Esq.  
Attorney for Plaintiff

Dated: September 2, 2021

**LAW OFFICES OF CONRAD PARK, P.C.**

Changhyun Conrad Park, Esq.  
 Attorney I.D.: 012082008  
 2160 N. Central Road Suite 106  
 Fort Lee, NJ 07024  
 (201) 266-0666  
 Attorneys for Plaintiff HU PIAO

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HU PIAO	: SUPERIOR COURT OF NEW JERSEY
	: LAW DIVISION
Plaintiff,	:
vs.	: BERGEN COUNTY

BYRON P GODFREY AND	: DOCKET NO.:
C & M MARKETING AND	:
FOOD SALES LLC	:
Defendant.	:

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FROM THE STATE OF NEW JERSEY,

*To the Defendant(s) Named Above:*

*The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971 Trenton, NJ 08625-0971. A filing fee payable to the clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to Plaintiff's attorney whose name and address appear above, or to Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer of motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.*

*If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.*

*If you cannot afford an attorney, you may call Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.*

Dated: September 2, 2021

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Michelle Smith Clerk of the Superior Court

Name of Defendant(s) to be served:

BYRON P GODFREY

C & M MARKETING AND FOOD SALES LLC

Address of Defendant(s) to be served:

BYRON P GODFREY- 3206 Rutledge Place, Quincy, Il 62301.

C & M MARKETING AND FOOD SALES LLC- 3206 Rutledge Place, Quincy, Il 62301.

## Civil Case Information Statement

### Case Details: BERGEN | Civil Part Docket# L-005868-21

**Case Caption:** PIAO HU VS GODFREY BYRON

**Case Initiation Date:** 09/03/2021

**Attorney Name:** CHANGHYUN PARK

**Firm Name:** CONRAD PARK

**Address:** 2160 N CENTRAL RD STE 106  
FORT LEE NJ 07024

**Phone:** 2012660666

**Name of Party:** PLAINTIFF : PIAO, HU

**Name of Defendant's Primary Insurance Company**  
(if known): progressive

**Case Type:** AUTO NEGLIGENCE-PERSONAL INJURY (NON-  
VERBAL THRESHOLD)

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 6 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same  
transaction or occurrence)?** NO

**Are sexual abuse claims alleged by:** HU PIAO? NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual  
management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** YES

**If yes, for what language:**

KOREAN

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

09/03/2021

Dated

/s/ CHANGHYUN PARK

Signed

**EXHIBIT “C”**

**FILED**

**SEP 07 2021**

*Prepared by the Court*

**BONNIE J. MIZDOL, A.J.S.C.**

HU PIAO,

Plaintiff,

v.

BYRON GODFREY AND C & M  
MARKING AND FOOD SALES LLC,  
Defendant.

:  
:  
: SUPERIOR COURT OF NEW JERSEY  
:  
: LAW DIVISION: BERGEN COUNTY  
:  
:  
: CIVIL ACTION NO. BER-L-5868-21  
:  
:  
: **ORDER TO TRANSFER VENUE TO**  
: **BURLINGTON COUNTY**  
:

**THIS MATTER**, having brought before the Court, *sua sponte*, and for good cause;

**IT IS**, on this 7<sup>th</sup> day of September, 2021, **ORDERED**

1. The venue in the above matter, Docket No. BER-L-5868-21, is hereby transferred from Bergen County to Burlington County.<sup>1</sup>

  
\_\_\_\_\_  
Hon. Bonnie J. Mizdol, A.J.S.C.

<sup>1</sup> R. 4:3-2(a)(3) governs where venue may be laid; it provides that venue shall be laid in the county in which the cause of action arose, or in which any party to the action resides at the time of its commencements [...]. This matter arises out of an automobile accident that occurred in Maple Shade Township, Burlington County, New Jersey. At the time of the instant filing, Plaintiff Hu Piao was a resident of Fairfax, Virginia, Defendant C & M Marketing and Food Sales LLC was a resident of Quincy, Illinois, and Defendant Byron P. Godfrey was a resident of Sanford, North Carolina. Since there is no Bergen County nexus to the cause of action, and the situs of the accident is Burlington County, transfer to Burlington County is appropriate.

### Case Summary

**Case Number:** BUR L-001919-21

**Case Caption:** Piao Hu Vs Godfrey Byron

**Court:** Civil Part

**Venue:** Burlington

**Case Initiation Date:** 09/03/2021

**Case Type:** Auto Negligence-Personal Injury (Non-Verbal Threshold)

**Case Status:** Active

**Jury Demand:** 6 Jurors

**Case Track:** 2

**Judge:** Aimee R Belgard

**Team:** 1

**Original Discovery End Date:**

**Current Discovery End Date:**

**# of DED Extensions:** 0

**Original Arbitration Date:**

**Current Arbitration Date:**

**# of Arb Adjournments:** 0

**Original Trial Date:**

**Current Trial Date:**

**# of Trial Date Adjournments:** 0

**Disposition Date:**

**Case Disposition:** Open

**Statewide Lien:**

#### Plaintiffs

**Hu Piao**

**Party Description:** Individual

**Attorney Name:** Changhyun Park

**Address Line 1:**

**Address Line 2:**

**Attorney Bar ID:** 012082008

**City:**

**State:** NJ

**Zip:** 00000

**Phone:**

**Attorney Email:** CONRADPARKLAW@GMAIL.COM

#### Defendants

**C & M Marketing Andfood Sales**

**Party Description:** Business

**Attorney Name:**

**Address Line 1:**

**Address Line 2:**

**Attorney Bar ID:**

**City:**

**State:** NJ

**Zip:** 00000

**Phone:**

**Attorney Email:**

**Byron P Godfrey**

**Party Description:** Individual

**Attorney Name:**

**Address Line 1:**

**Address Line 2:**

**Attorney Bar ID:**

**City:**

**State:** NJ

**Zip:** 00000

**Phone:**

**Attorney Email:**

#### Case Actions

Filed Date	Docket Text	Transaction ID	Entry Date
09/09/2021	TRACK ASSIGNMENT Notice submitted by Case Management	LCV20212082369	09/09/2021

**EXHIBIT “D”**



**AFFIDAVIT OF SERVICE**

**State of New Jersey**

**County of BERGEN**

**Superior Court**

Case Number: BER-L-5868-21

Plaintiff:  
**HU PIAO**

vs.

Defendant:  
**BYRON GODFREY AND C&M MARKING AND FOOD SALES**

For:  
BERGEN LAWYER SERVICE, LLC  
4 RIVER STREET EXT.  
APT 63  
LITTLE FERRY, NJ 07643

Received by Big River Investigations on the 7th day of September, 2021 at 1:38 pm to be served on **BYRON GODFREY, 3206 RUTLEDGE PL, QUINCY, IL 62301**.

I, GARRETT RILEY, being duly sworn, depose and say that on the **15th day of September, 2021 at 9:45 am, I:**

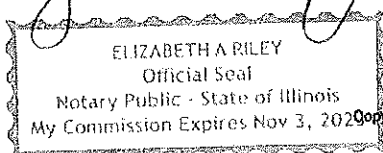
**SUBSTITUTE** served by delivering a true copy of the **ORDER TO TRANSFER VENUE TO BURLINGTON COUNTY; COMPLAINT WITH DEMAND FOR TRIAL BY JURY** with the date and hour of service endorsed thereon by me, to: **CASEY MUEHRING** as **MANAGER**, a person employed therein and authorized to accept service for **BYRON GODFREY** at the address of: **3206 RUTLEDGE PL, QUINCY, IL 62301**, the within named person's usual place of **Work**, in compliance with State Statutes.

**Description of Person Served:** Age: 35, Sex: F, Race/Skin Color: WHITE, Height: 5'4", Weight: 200, Hair: BLOND, Glasses: Y

I certify that I am over the age of 21, have no interest in the above action, in the judicial circuit in which the process was served.

Subscribed and Sworn to before me on the 15th day of September, 2021 by the affiant who is personally known to me.

  
NOTARY PUBLIC



  
GARRETT RILEY  
Process Server

Big River Investigations  
437 North 9th Street  
Quincy, IL 62301  
(217) 228-9114

Our Job Serial Number: BRI-2021001267

**EXHIBIT “E”**

HU PIAO Plaintiff  
 vs.  
 BYRON GODFREY AND C&M Defendant  
 MARKING AND FOOD SALES

Superior Court of New Jersey  
 Law Division  
 BERGEN County  
 Docket Number: BER-L-5868-21

Person to be served (Name & Address):  
 C&M MARKETING AND FOOD SALES, LLC  
 3206 RUTLEDGE PL  
 QUINCY, IL 62301

## AFFIDAVIT OF SERVICE

(For Use by Private Service)

Attorney:  
 BERGEN LAWYER SERVICE, LLC  
 4 RIVER STREET EXT.  
 APT 63  
 LITTLE FERRY, NJ 07643

**Papers Served:** ORDER TO TRANSFER VENUE TO BURLINGTON COUNTY; COMPLAINT WITH DEMAND FOR TRIAL BY JURY

### Service Data:

Served Successfully X Not Served \_\_\_\_\_ Date: 9/11/2021 Time: 3:47 pm Attempts: \_\_\_\_\_

\_\_\_\_\_ Delivered a copy to him / her personally

Name of Person Served and relationship / title:

\_\_\_\_\_ Left a copy with a competent household member over 14 years of age residing therein

CASEY MUERING

OWNER

X Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc.

### Description of Person Accepting Service:

Sex: F Age: 35 Height: 5'4" Weight: 200 Skin Color: WHITE Hair Color: BLOND

### Unserved:

- ( ) Defendant is unknown at the address furnished by the attorney  
 ( ) All reasonable inquiries suggest defendant moved to an undetermined address  
 ( ) No such street in municipality  
 ( ) No response on: \_\_\_\_\_ Date \_\_\_\_\_ Time \_\_\_\_\_  
 \_\_\_\_\_ Date \_\_\_\_\_ Time \_\_\_\_\_  
 ( ) Other: \_\_\_\_\_

### Comments or Remarks:

09/11/2021 3:47 PM CASEY AND CASON MUERING OWN COMPANY.

### Server Data:

Subscribed and Sworn to before me on the 15th day of September, 2021 by the affiant who is personally known to me.

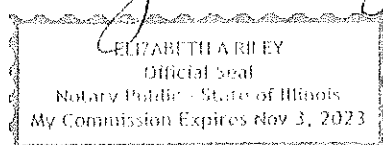
NOTARY PUBLIC

I, GARRETT RILEY, was at the time of service a competent adult not having a direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Signature of Process Server

Date

Big River Investigations  
 437 North 9th Street  
 Quincy, IL 62301  
 (217) 228-9114  
 Our Job Serial Number: BRI-2021001268



**EXHIBIT “F”**

CONFIDENTIAL  
CONRAD PARK PC  
CHANGHYUN CONRAD PARK  
2160 N CENTRAL ROAD  
SUITE 106  
FT LEE, NJ 07024

**Underwritten By:  
Artisan and Truckers Casualty Company**

Claim Number: 20-4189215  
Loss Date: September 26, 2020  
Loss State: NJ  
Report Date: October 27, 2020  
Document Date: August 5, 2021  
Page 1 of 1

**claims.progressive.com**

Track the status and details of your  
claim, e-mail your representative or  
report a new claim.

## Claim Information

RE:

CONFIDENTIAL  
Your Client : HU PIAO

Fax Number : 917-688-2268

In response to your counter demand of \$75,000.00 on August 5, 2021, I have reviewed your client's claim and will extend an offer for \$25,000.00 for full and final settlement of your client's Bodily Injury claim.

Please contact me as soon as possible so we can hopefully come to a fair and amicable resolution of your client's claim.

Sincerely,

CONFIDENTIAL  
SCOTT D COLBERT  
Claims Department  
1-440-620-2628  
1-800-PROGRESSIVE (1-800-776-4737)  
Fax: 1-833-905-1738

cc: BYRON GODFREY  
C AND M MARKETING AND FOOD SALES LLC

Form Z587 (01/08)

Pol: 5345J 262773Claim: 076079-GLIns: Hu PiaoDoL: 09/25/2020St: OpenAdj: Jessica M Byrd (Claims Recovery Services Group 3 Unit 5)

**Search Summary: Underwriting Company: Nationwide | Claim Number: 076079-GL | Adjuster Name: Corinne E Johnson | P.O. Box 26005-Daphne-AL-36526-2605/717-229-7710/JOHNC100@nationwide.com/877-590-8188 | Exposures: (4) 1st Party Med Pay - Hu Piao | Cost Type: Indemnity**

Total: \$17888.38									
Payee/ Payer Name	Service Date From	Service Date To	Transaction Date	EXP Type	Amount	Check Number	Explanation Number	Cost Type	TOL
CHANG ADVANCED CHIROPRAC	10/20/2020	11/19/2020	11/30/2020	Med Pay	\$3,548.00	16002291	NM5237992	Indemnity	Not Applicable
CHANG ADVANCED CHIROPRAC	11/21/2020	01/07/2021	01/14/2021	Med Pay	\$3,772.00	16177040	NM5275024	Indemnity	Not Applicable
INSIGHT HEALTH CORP	01/26/2021	01/26/2021	02/04/2021	Med Pay	\$1,309.60	43116346	NI0987876	Indemnity	Not Applicable
INSIGHT HEALTH CORP	01/26/2021	01/26/2021	02/04/2021	Med Pay	\$1,509.60	43116349	NI0987882	Indemnity	Not Applicable
CHANG ADVANCED CHIROPRAC	01/12/2021	02/09/2021	03/02/2021	Med Pay	\$1,803.80	16352335	NM5318517	Indemnity	Not Applicable
Hu Piao	02/09/2021	02/09/2021	03/17/2021	Med Pay	\$67.57	16410278		Indemnity	Not Applicable
CHANG ADVANCED CHIROPRAC	02/11/2021	03/18/2021	03/31/2021	Med Pay	\$2,253.00	16471758	NM5348335	Indemnity	Not Applicable
Hu Piao	03/26/2021	03/26/2021	04/15/2021	Med Pay	\$15.65	16526793		Indemnity	Not Applicable
Hu Piao	04/16/2021	04/16/2021	04/23/2021	Med Pay	\$53.34	16563963		Indemnity	Not Applicable

Pol: 5345J 262773Claim: 076079-GLIns: Hu PiaoDoL: 09/25/2020St: OpenAdj: Jessica M Byrd (Claims Recovery Services Group 3 Unit 5)

Total: \$17888.38									
Payee/ Payer Name	Service Date From	Service Date To	Transaction Date	EXP Type	Amount	Check Number	Explanation Number	Cost Type	TOL
CHANG ADVANCED CHIROPRAC	03/23/2021	05/06/2021	06/17/2021	Med Pay	\$2,465.00	16769381	NM5421108	Indemnity	Not Applicable
GALLOWS INTERNAL MEDICINE INC	10/29/2020	11/12/2020	06/18/2021	Med Pay	\$420.00	43345192	NU0368795	Indemnity	Not Applicable
GREATER WASHINGTON ORTHOPAED GROUP PA	02/08/2021	03/23/2021	06/21/2021	Med Pay	\$395.82	16777120		Indemnity	Not Applicable
Hu Piao	02/08/2021	03/23/2021	06/21/2021	Med Pay	\$275.00	16777140		Indemnity	Not Applicable

**EXHIBIT “G”**



**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(Camden Vicinage)**

HU PIAO,

Plaintiff,

v.

Civil Action No.:

BYRON P. GODFREY; and C&M MARKETING  
AND FOOD SALES, LLC,

Defendants.

**ANSWER, DEFENSES AND CROSS CLAIMS OF DEFENDANTS, BYRON P. GODFREY AND  
C&M MARKETING AND FOOD SALES, LLC, TO PLAINTIFF'S COMPLAINT**

Defendants, Byron P. Godfrey and C&M Marketing and Food Sales, LLC (hereinafter referred to as "Defendants" or "C&M"), by way of Answer to the Plaintiff's Complaint, hereby states:

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

2. Admitted.

3. Admitted.

4. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

5. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

6. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

7. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

8. Denied.

9. Denied.

10. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

11. Defendants are without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph, and the same are accordingly denied and strict proof thereof is demanded at the time of trial.

**WHEREFORE**, Defendants, Byron P. Godfrey and C&M Marketing and Food Sales, LLC, hereby demands judgment against the Plaintiff dismissing Plaintiff's Complaint with prejudice and respectfully requests that the Court enter a judgment in its favor and against the Plaintiff for attorneys' fees and costs and any other relief that this Court deems just and appropriate.

#### **SEPARATE DEFENSES**

1. The Complaint fails to state a claim upon which relief may be granted, and Defendants reserve the right to move to dismiss.

2. The Complaint is barred by the applicable statute of limitations and/or statute of repose governing such claims.

3. The incidents complained of were caused by third parties over whom Defendants had no control.

4. If Plaintiff sustained injuries or damages, those injuries or damages were proximately caused by the superseding intervening actions of others.

5. Defendants breached no duty to any party herein.

6. Plaintiff's claims are barred by the doctrine of laches.

7. Plaintiff's claims are barred by the doctrine of waiver.
8. Plaintiff's claims are barred by the doctrine of unclean hands.
9. Plaintiff's claims are barred by the doctrine of estoppel.
10. Plaintiff's claims are barred by the doctrine of joint enterprise.
11. Plaintiff's claims are barred, in whole or in part, by the entire controversy doctrine.
12. Without admitting any liability herein, and without admitting that Plaintiff has suffered any damages at all, Plaintiff failed to take reasonable steps to mitigate damages, if any.
13. Defendants complied with all applicable and existing state and federal statutes and regulations and industry standards.
14. Plaintiff's claims are barred or diminished and reduced by the doctrine of comparative negligence under the New Jersey Comparative Negligence Act, N.J.S.A. 2A:15-5.1 et seq.
15. Plaintiff's claims are barred or diminished and reduced by the Collateral Source Rule, as set forth in N.J.S.A. 2A:15-97.
16. Plaintiff's claims are barred, in whole or in part, because Plaintiff lacks the requisite standing to proceed with this litigation.
17. This action is barred, in whole or in part, by Plaintiff's failure to join a party without whom the action cannot proceed pursuant to R. 4:28-1.
18. Defendants deny any claim for strict liability, if any.
19. Defendants deny any claim for compensatory damages.
20. Defendants deny any claim for punitive damages.
21. Plaintiff's claims are barred, in whole or in part, by accord and satisfaction.
22. Service of process was insufficient and/or improper and Plaintiff's claims should be dismissed accordingly.
23. Plaintiff's claims are barred, in whole or in part, by F.R.C.P. 11 (b), and, as present, is frivolous, improper, intended to harass, is unwarranted, baseless and is lacking in evidentiary support, and, as a result, Defendants are entitled to sanctions.

**REQUEST FOR STATEMENT OF DAMAGES**

1. You are hereby requested and required to furnish to the undersigned within five (5) days, a written statement of the amount of damages claimed.

**DESIGNATION OF TRIAL COUNSEL**

**PLEASE TAKE NOTICE** that pursuant to Rule 4:25-4, Marc R. Jones, Esquire, is hereby designated as trial counsel in the above matter.

**DEMAND FOR JURY TRIAL**

Defendants hereby demand a trial by jury as to all issues.

**CERTIFICATION**

The matter in controversy is not the subject to any other known action pending in any Court, or of a known or contemplated arbitration proceeding. There are no other parties known who should be joined in this action.

**CIPRIANI & WERNER, P.C.**



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